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Attorneys for Plaintiff, HSBC Bank USA, National Association, as Trustee for Mortgage Pass-Through Certificates, MLMI Series 2006-A4

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 HSBC BANK USA, NATIONAL
11 ASSOCIATION, AS TRUSTEE FOR
12 MORTGAGE PASS-THROUGH
13 CERTIFICATES, MLMI SERIES 2006-A4, a
Virginia Company

14 Plaintiff,

15 vs.

16 OPERTURE, INC., a Domestic Close
17 Corporation; BRIDGER INVESTMENT, LLC,
18 a Nevada limited-liability company; and
19 SUNSET CLIFFS HOMEOWNERS
20 ASSOCIATION, a Domestic Non-Profit
Company,

21 Defendants.

Case No.: 2:16-cv-02896-RFB-BNW

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE DISMISSAL
DOCUMENTS**

(Second Request)

22 IT IS HEREBY STIPULATED that Plaintiff, HSBC Bank USA, National Association,
23 as Trustee for Mortgage Pass-Through Certificates, MLMI Series 2006-A4 (hereinafter "HSBC
24 Bank"), Defendant Bridger Investment, LLC (hereinafter "Bridger") and Defendant Sunset
25 Cliffs Homeowners Association (hereinafter "Sunset Cliffs") (collectively, the "Parties") by and
26 through their undersigned counsel of record, hereby agree and stipulate as follows:
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1. On July 15, 2019, HSBC Bank filed its Notice of Settlement [ECF No. 37] that the Parties had reached a settlement in this action;
2. On July 16, 2019, this Court issued its Minute Order setting the deadline of August 30, 2019 to file the Stipulation for Dismissal [ECF No. 38];
3. The terms of the Settlement Agreement have been negotiated and the Settlement Agreement has been fully executed;
4. Counsel for HSBC Bank has obtained the settlement funds from Sunset Cliffs and Bridger and the funds were forwarded to HSBC Bank on October 29, 2019;
5. Pursuant to the Parties' Settlement Agreement, the funds must be received by HSBC Bank and applied to the loan before the Parties can proceed with filing the Stipulation and Order to Dismiss matter with Prejudice;
6. The Parties are requesting an additional forty-five (45) days to finalize the terms of the settlement, and thus request up to December 13, 2019, to file the Stipulation for Dismissal;

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1 7. This is the second request for an extension and is submitted in good faith and not
2 intended to cause any delay to the Court.

3 **IT IS SO STIPULATED.**

4 DATED this 29th day of October, 2019.

5 WRIGHT, FINLAY & ZAK, LLP

6 /s/ Lindsay D. Robbins

7 Lindsay D. Robbins, Esq.

8 Nevada Bar No. 13474

9 7785 W. Sahara Ave, Suite 200

10 Las Vegas, NV 89117

11 *Attorneys for Plaintiff, HSBC Bank*

12 DATED this 29th day of October, 2019.

13 BROWNSTEIN HYATT FARBER

14 SCHRECK, LLP

15 /s/ Troy Domina

16 Troy Domina, Esq.

17 Nevada Bar No. 13862

18 100 N. City Parkway, Suite 1600

19 Las Vegas, NV 89106

20 *Attorneys for Defendant, Bridger Investment,*
21 *LLC*

DATED this 29th day of October, 2019.

BOYACK ORME & ANTHONY

/s/ Patrick Orme

Patrick Orme, Esq.

Nevada Bar No. 7853

7432 W. Sahara Ave.

Las Vegas, NV 89117

Attorneys for Defendant, Sunset Cliffs
Homeowners Association

Case No.: 2:16-cv-02896-RFB-BNW

22 **ORDER**

23 **IT IS SO ORDERED.**

24 

25 RICHARD F. BOULWARE, II
26 UNITED STATES DISTRICT JUDGE
27 DATE this 1st day of November, 2019.
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